

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

XU LUN, a pseudonym,

Plaintiff,

v.

Case No.: 24-cv-803

MILWAUKEE ELECTRIC TOOL
CORPORATION and TECHTRONIC
INDUSTRIES COMPANY LIMITED,

Defendants.

**MOTION TO FILE CIVIL LOCAL RULE 7.1
DISCLOSURE STATEMENT UNDER SEAL**

Pursuant to Local Rules 7.1 and 10(c), plaintiff Xu Lun (a pseudonym) asks the court for leave to file a copy of his Local Rule 7.1 disclosure statement indicating his actual name under seal. No brief will be filed in support of this motion unless requested by the Court.

Lun seeks leave to file this document under seal because he intends to ask the Court's permission to proceed pseudonymously. Lun fears retaliation from the government of the People's Republic of China for bringing this suit. Within 21 days of service of his complaint, Lun will file a motion to proceed pseudonymously pursuant to Local Rule 10(c).

Dated: June 27, 2024.

HAWKS QUINDEL, S.C.

By: /s/ Aaron J. Bibb

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